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14 UNITED STATES DISTRICT COURT
15 DISTRICT OF NEVADA

16 ALLSTATE INSURANCE COMPANY,
ALLSTATE PROPERTY & CASUALTY
17 INSURANCE COMPANY, ALLSTATE
INDEMNITY COMPANY, and ALLSTATE
18 FIRE & CASUALTY INSURANCE
COMPANY,

19 Plaintiffs,

20 v.

21 MARJORIE BELSKY, MD; MARIO
22 TARQUINO, MD; MARJORIE BELSKY,
MD, INC., doing business as INTEGRATED
23 PAIN SPECIALISTS; and MARIO
24 TARQUINO, MD, INC., DOES 1-100, and
ROES 101-200,

25 Defendants.

26 AND RELATED CLAIMS
27
28

CASE NO. 2:15-cv-2265-MMD-CWH

**STIPULATION TO INCLUDE THE
DECASTROVERDE LAW GROUP INTO
THE STIPULATED CONFIDENTIALITY
AND PROTECTIVE ORDER (ECF NO.
49) FOR THE DISCLOSURE OF
DOCUMENTS PURSUANT TO F.R.C.P.
45 SUBPOENA**

2:15-cv-2265-MMD-CWH

**STIPULATION TO INCLUDE THE DECASTROVERDE LAW GROUP INTO THE STIPULATED
CONFIDENTIALITY AND PROTECTIVE ORDER (ECF NO. 49) FOR THE DISCLOSURE OF
DOCUMENTS PURSUANT TO F.R.C.P. 45 SUBPOENA**

1 Plaintiffs/Counter-defendants ALLSTATE INSURANCE COMPANY, ALLSTATE
2 PROPERTY & CASUALTY INSURANCE COMPANY, ALLSTATE INDEMNITY COMPANY,
3 and ALLSTATE FIRE & CASUALTY COMPANY (collectively referred to as the "Plaintiffs"), and
4 the law firm of DECASTROVERDE LAW GROUP (non-party herein after referred to as "DLG")
5 hereby stipulate and agree as follows:

6 1. Plaintiffs served DLG with a subpoena pursuant to F.R.C.P. 45 for the production of
7 documents regarding communications and payments made by and between Law
8 Firm and the Defendants during DLG's representation of certain clients in personal injury claims for
9 which Plaintiffs paid on settlement on behalf of Plaintiffs' insureds.

10 2. DLG provided a written objection to the Rule 45 subpoena.

11 3. DLG is aware that Plaintiffs have subpoenaed several law firms seeking the same type
12 of information pursuant to Rule 45 in this case, as well as a companion sister-lawsuit *Allstate v. Shah*,
13 *et. al. Case No. 2:15-cv-01786-APG-CWH* ("*Shah*").

14 4. DLG understands that this Court presides over both the instant matter as well as the
15 *Shah* matter, and that this Court has ruled consistently in both these cases and ordered other law firms
16 to produce the same type of documents request of DLG.

17 5. A stipulated confidentiality and protective order in this case entered between Plaintiffs
18 and Defendants for the disclosure of confidential, sensitive or other protected information was
19 approved by this Court on June 3, 2016. (ECF No. 49).

20 6. DLG was not a party to the stipulated confidentiality and protective order. (ECF No.
21 49).

22 7. In ordering compliance with Plaintiffs' subpoenas to other law firms, this Court also
23 ordered that the confidentiality and protective order (ECF No. 49) be applied to those law firms.

24 8. In accordance with this Court's prior rulings both in this action and in the *Shah* matter,
25 the parties hereby stipulate and agree that the protections and scope articulated in the Stipulated
26 Confidentiality and Protective Order approved by this Court on June 3, 2016. (ECF No. 49) be
27 extended in their entirety to cover DLG in its compliance with Plaintiffs' subpoena.

1 9. DLG will produce all documents responsive to the subpoena within ten (10) days of
2 approval and entry of this Order by the Court.

3 IT IS SO STIPULATED.

4 Dated: _____

Dated: _____

5 McCORMICK, BARSTOW, SHEPPARD,
6 WAYTE & CARRUTH LLP

DE CASTROVERDE LAW GROUP

7 By: /s/ Dylan P. Todd

By: /s/ Michael Matzke

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15 **ORDER**

16 IT IS SO ORDERED.

17 DATED this 28 day of August, 2018.

18
19 
20 UNITED STATES MAGISTRATE JUDGE

21 03246-01560 5279245.1